

1 IN RE:

US EPA RECORDS CENTER REGION 5



487177

2  
3 INTERVIEWS OF IWD DRIVERS

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5 \* \* \*

6 Sworn Statement of VERNON VENCILL, Witness  
7 herein, taken before me, the undersigned, Carol A.  
8 Sawyer, a Notary Public in and for the State of Ohio,  
9 at the offices of Industrial Waste Disposal,  
10 3975 Wagner-Ford Road, Dayton, Ohio, on Monday,  
11 March 1, 1993, at 4:25 o'clock a.m.

12 \* \* \*

## 1 APPEARANCES:

2 On behalf of Industrial Waste Disposal:

3 Waste Management of North America, Inc.

4 By: Robert E. Leininger  
Attorney at Law  
5 Meg Briarton  
Paralegal  
6 Mideast Region  
17250 Newburgh Road  
7 Livonia, Michigan 48152

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1                                    VERNON VENCILL  
2 of lawful age, Witness herein, having been first duly  
3 cautioned and sworn, as hereinafter certified, was  
4 examined and said as follows:

5                                    EXAMINATION

6 BY-MR. LEININGER:

7                    Q.     Would you please state your name?

8                    A.     Vernon Vencill.

9                    Q.     And your address?

10                  A.     3115 Meyers Tillman Road, Arcanum, Ohio.

11                  Q.     And your age?

12                  A.     Forty-nine.

13                  Q.     Are you currently employed by IWD?

14                  A.     Yes, sir.

15                  Q.     And what is your position?

16                  A.     Truck driver.

17                  Q.     When did you begin working for IWD  
18 approximately?

19                  A.     I believe it was '72, 1972.

20                  Q.     And what was your position that you were  
21 hired into?

22                  A.     Truck driver.

23                  Q.     So have you been a truck driver during  
24 your entire career with IWD?

25                  A.     Yes, sir.

1 Q. What type of truck did you originally  
2 drive?

3 A. Dumpmaster.

4 Q. Was that a front end?

5 A. Yes. I drove one for one day, and then  
6 changed to a rolloff truck.

7 Q. Okay. So after the first day you drove a  
8 rolloff truck?

9 A. Yes, for about the next seven years or  
10 eight approximately.

11 Q. All right. And then after that?

12 A. Then I started driving a lugger, and I  
13 drove one of those for about seven or eight years, in  
14 that area.

15 Q. And then?

16 A. Back to a rolloff for a couple of years.  
17 And then back to a front load, which I'm driving now.

18 Q. How long have you been driving that front  
19 load?

20 A. Approximately six years.

21 Q. I'd like to start at the beginning back in  
22 1972 when you were driving the rolloff. Can you just  
23 briefly describe for me how you would be assigned  
24 destinations to pick up waste from customers?

25 A. Our assignments was on a day-to-day

1 basis. We were dispatched by the dispatcher, we never  
2 knew where we was going until the starting time each  
3 morning, and he just sent us wherever he decided to  
4 send us to. And then whatever customers after the  
5 first one, whatever customers we were closer to,  
6 that's where we went to pick up the trash.

7 Q. So in the morning then he would tell you  
8 to go to one specific location?

9 A. Right.

10 Q. And then, would you call in after that  
11 to --

12 A. Yes, we always called in when we was  
13 finished with the load. Say, for instance, if we was  
14 hauling a Dayton Tire and Rubber where they had a lot  
15 of containers, if they was full we might spend the  
16 whole day at one place. If they didn't have a  
17 substantial amount, we would go someplace else. That  
18 was the way it went every day.

19 Q. Now, can you recall -- did you have a  
20 fairly specific number of customers that you would  
21 pick up, like a limited number that the rolloff  
22 drivers handled, do you know about how many customers  
23 they had, was it quite a large number of rolloff  
24 customers?

25 A. Yes, we had a substantial amount. I

1 believe each driver would probably haul somewhere  
2 between eight and twelve loads a day, depending on how  
3 close they was and how far they had to haul them.

4 Q. Do you recall what landfill the rolloff  
5 drivers would use during '72, that early?

6 A. Myself, it was Valleycrest. I believe  
7 that's about the only landfill we used in this area.

8 Q. During that period of time?

9 A. Yes.

10 Q. Powell Road was over there, but that was  
11 owned by SCA?

12 A. SCA.

13 Q. Is that because Danis wanted to use their  
14 own landfill, I mean, as far as you would imagine?

15 A. Yes, they kept -- didn't want to pay money  
16 to dump somewhere else when they had their own  
17 landfill. I mean, that wouldn't be logical.

18 Q. Now, the dispatchers that you had working  
19 during that period of time, do you remember any of  
20 their names?

21 A. Yes, we had Jim Foster, Bob Dalton. We  
22 had others, but I don't know -- I don't know their  
23 names.

24 Q. Okay.

25 A. We went through a few of them.

1 Q. Sure. Now, during that period of time  
2 when you were on rolloff, you only hauled to  
3 Valleycrest that you can recall?

4 A. In the immediate area. You mean, in  
5 Dayton?

6 Q. I guess that's my question. You said you  
7 were rolloff for like seven years.

8 A. We hauled out of different cities, and  
9 then if there was a landfill in that city, we took it  
10 to there, depending on where we was designated to go  
11 to.

12 Q. I see.

13 A. Here in Dayton we hauled everything to  
14 Valleycrest.

15 Q. Would that be -- and that would be true of  
16 all IWD rolloff drivers in the Dayton area?

17 A. Yes, sir.

18 Q. All that would go into Valleycrest?

19 A. As far as I recall, yes.

20 Q. Okay. Up until Valleycrest closed?

21 A. Yes.

22 Q. After Valleycrest closed, then where did  
23 the rolloff loads go to?

24 A. We hauled some loads to Powell Road, and  
25 the rest went down to Cardington.

1           Q.    Depending upon geographic location, I  
2 suppose?

3           A.    Yes, sir.

4           Q.    You had mentioned that if you were in  
5 other cities, other locations outside of Dayton, other  
6 landfills would be used?

7           A.    Yes, sir.

8           Q.    Can you tell me what cities and landfills  
9 we are talking about?

10          A.    Well, in Sidney we used the -- the Sidney  
11 landfill. Troy, we used the Troy transfer Station.  
12 Xenia, we used Armentrout's landfill. Franklin, we  
13 used Black Clawson landfill. That's all I can recall.

14          Q.    Okay. What city was the Black Clawson  
15 located?

16          A.    Franklin.

17          Q.    Oh, Franklin. And in Xenia, you said  
18 Armen --

19          A.    Armentrout.

20          Q.    -- Armentrout?

21          A.    I don't know how to spell it.

22          Q.    That's what it sounds like?

23          A.    Yeah, more or less. It was a personally  
24 owned, privately owned landfill.

25          Q.    Oh, okay.



1           A.    I'm sorry, we did haul to the Xenia City  
2 landfill also.

3           Q.    Okay. Did the rolloff drivers during that  
4 period of time have any specific area that they would  
5 generally be dispatched to, or was it just pretty  
6 much --

7           A.    First come first served.

8           Q.    Okay.

9           A.    That's the way it went.

10          Q.    So you could be in Sidney one day, and  
11 another driver could be there the next day?

12          A.    Yeah, very possible.

13          Q.    Okay. So, in other words, the geographic  
14 area that you handled for Danis pretty well describes  
15 Danis's geographic area for rolloffs?

16          A.    Right.

17          Q.    Okay. Keeping that in mind, can you tell  
18 me, I would certainly think that most of the waste was  
19 the Dayton area waste?

20          A.    Yes.

21          Q.    Can you give me some rough estimate as to  
22 about how much wasn't in the Dayton area?

23          A.    Was in Dayton?

24          Q.    Was not in.

25          A.    Oh. No, not hauled to Valleycrest. As

1 far as I recall, everything that we hauled over there  
2 came from the Dayton area.

3 Q. No, I mean -- I'm just trying to get the  
4 big picture. Everything in Dayton went to  
5 Valleycrest?

6 A. Yes.

7 Q. Everything that was outside of Dayton, I'm  
8 just trying to think of what percent that would be,  
9 was it a third, a quarter, a percent?

10 A. Oh, I wouldn't even want to guess at what  
11 that was. We had so many drivers that went so many  
12 places.

13 Q. I'm just thinking about your own  
14 experience. I mean, was it pretty often that you  
15 would be over in Sidney, Xenia?

16 A. Oh, yes, we kept a driver in Xenia every  
17 day.

18 Q. Oh, I see.

19 A. We had customers in Troy. It just  
20 depended on where they wanted up as to where we  
21 hauled.

22 Q. As I had indicated to you before we  
23 started this statement, one thing I would like to  
24 accomplish, if I can, is to tie down all the little  
25 sites as well as we can.

1           A.    Yes, such as Tremont City. I forgot about  
2 them. We did haul to Tremont City.

3           Q.    The reason being, I would have to do one  
4 for each one of these little places, I think it's not  
5 likely, but I think it would be good to knock them out  
6 of the way.

7                   Sidney, do you remember who our customers  
8 were there?

9           A.    Stolle was one of them. General Films.  
10 That's the only two I recall at the time.

11          Q.    Okay. For Stolle, do you know generally  
12 what the kind of waste was?

13          A.    Aluminum materials. They made aluminum  
14 products.

15          Q.    So, aluminum scraps, things like that?

16          A.    Yes.

17          Q.    Were there any liquids, sludges?

18          A.    Not that I'm aware of.

19          Q.    Anything like that?

20          A.    Not that I'm aware of.

21          Q.    Just pretty much loose trash?

22          A.    Yes.

23          Q.    You don't recall anything out of the  
24 ordinary from Stolle?

25          A.    No, sir, I don't.

1 Q. Okay. How about General Films?

2 A. General Films, I really don't know what  
3 the trash was, but just by the name I'm guessing that  
4 they did deal in films. I don't know that, I never  
5 looked to see what it was.

6 Q. Okay. Was there any way of determining  
7 whether it was solid, loose, anything like that?

8 A. Oh, it was loose trash, paper trash of  
9 sorts, but like I say, back then we didn't concern  
10 ourself with what was in them, we would just haul  
11 them.

12 Q. Right. But again, nothing like liquids  
13 and sludges in drums or anything like that?

14 A. No, sir, no, sir.

15 Q. Okay. How about to the Troy transfer?

16 A. That was basically Gummed Products, and  
17 that was paper trash basically. They dealt in  
18 stickers and things for packages and stuff.

19 Q. And then Xenia.

20 A. We hauled from USI.

21 Q. Do you know what USI stands for?

22 A. I did at one time, yes. It changed  
23 names. When we first started hauling it wasn't USI,  
24 and then it changed to USI, but I don't know what that  
25 stands for. They make lamp black. That's for

1 coloring rubber black.

2 Q. And the waste from USI would have been, do  
3 you know?

4 A. It was lamp black dust. That's all I can  
5 tell you. It was just black dust.

6 Q. Okay. There was just one kind of waste  
7 coming out of there?

8 A. Yes, as far as I recall.

9 Q. You had mentioned the Xenia City landfill  
10 and that other one that starts with an A.

11 A. Armentrout.

12 Q. Armentrout?

13 A. Armentrout is where we hauled USI.

14 Q. And to the Xenia City landfill?

15 A. That was some of the contractors that was  
16 designated to go up there. For what purposes, I don't  
17 know. We were designated to haul for the purpose of  
18 the customer.

19 Q. The waste that went to Xenia City  
20 landfill, that was basically customers directed us to  
21 go there?

22 A. Yes, like K Marts and places like that  
23 that were in Xenia. I guess it was due to the city's  
24 tax purposes or something, I don't know.

25 Q. Oh, okay. How about Franklin?

1           A.    That was basically from Mound  
2 Laboratories.

3           Q.    Okay. Do you know what their waste was, I  
4 mean, can you describe it at all?

5           A.    No. Like I say, we never -- we never  
6 looked in the trash, or wasn't concerned with it. We  
7 hauled a substantial amount of trash down there from  
8 the Mound.

9           Q.    Again, as far as you can tell, was it just  
10 loose trash?

11          A.    Yes.

12          Q.    Solid, no liquids and sludges or anything  
13 like that?

14          A.    No, not that I recall.

15          Q.    Okay. How about Tremont?

16          A.    There to Tremont I hauled some sludges  
17 from Harrison Radiator in Dayton. That's all I hauled  
18 up there.

19          Q.    Okay. Any idea how often there would be a  
20 pull out of there?

21          A.    Sometimes once a day, sometimes every  
22 other day. It just depended on how much they  
23 produced.

24          Q.    Okay. So that covers everything other  
25 than Valleycrest?

1           A.    Yes.

2           Q.    Let's talk about Valleycrest then.  You  
3    had indicated that the greater Dayton area, that's  
4    pretty much -- seeing as you're giving me that look  
5    about greater Dayton area, let me take this  
6    opportunity to just mention to you that as you've  
7    heard before, that if anything I say is not clear,  
8    please don't hesitate to just ask a question.

9           A.    All right.  To Valleycrest, the way I  
10   count the Dayton area, because I count the whole Miami  
11   Valley, Brookville, Trotwood, Vandalia, Fairborn,  
12   Miamisburg, that pretty well sums up the greater  
13   Dayton area, I think.

14          Q.    Okay.  Can you recall who some of the main  
15   customers were going into Valleycrest?

16          A.    Dayton Tire and Rubber, DAP, Duriron.  
17   That's about it right off the top for the basic  
18   customers.

19          Q.    Okay.  Dayton Tire and Rubber, do you know  
20   about where they were located?

21          A.    Yes, Rosedale.

22          Q.    And do you recall approximately how often  
23   there would be a pickup from them?

24          A.    Every day, all day long.

25          Q.    So, can you estimate about how many

1 rollofs would be pulled out of there every day?

2 A. Possibly ten to twelve.

3 Q. Okay. How many yards were those?

4 A. It varied. Some was thirty yards,  
5 thirty-six, forty-two.

6 Q. Did they have a number of containers  
7 staged around the plant?

8 A. Yes, there was probably ten or twelve  
9 containers over there at the time.

10 Q. Oh, okay. So just whenever different  
11 sizes and things like that?

12 A. Yes, depending on what was filled at what  
13 time, then we would haul them.

14 Q. Then they would call up the company and  
15 they would dispatch out of there?

16 A. Yes, they would say come over and make a  
17 day out of it.

18 Q. Do you remember if it was pretty much the  
19 same kind of waste?

20 A. Continuously, yes.

21 Q. In the different -- you wouldn't have one  
22 kind of waste in one area and one kind in another  
23 area?

24 A. Certainly. In some areas nothing but  
25 tires, in another wood, in another area shredded



1 tires, and then just your basic trash, cardboard  
2 drums, boxes the tires came in.

3 Q. It sounds like a recycling center.

4 A. More or less. They did quite a business.

5 Q. You mentioned tires and wood and trash.

6 Can you recall anything else that they had there?

7 A. Yes, we hauled sludge in a lugger truck.

8 I have no idea of what was in it, but it was a sludge.

9 Q. Do you know about how many yards the  
10 lugger was?

11 A. It was a ten yard.

12 Q. Okay. Did they just have the one ten yard  
13 lugger out there, as far as you can recall?

14 A. If I recall, that's all we had was one,  
15 yes.

16 Q. Okay. And about how often would that  
17 thing get filled up?

18 A. That would vary. I wouldn't even want to  
19 guess at how often. It was never the same schedule of  
20 everything, it was just when it got filled.

21 Q. It would depend on their process?

22 A. Yes, how fast they was running, and what  
23 they was producing.

24 Q. Well, let's guess anyway. More than once  
25 a month?

1           A.    Oh, yes.  Sometimes once a week, maybe  
2 more than that.

3           Q.    So if you were just to estimate, you would  
4 say -- would it be fair to say somewhere in the range  
5 of maybe once a week, but sometimes more often,  
6 sometimes less often?

7           A.    Yes.

8           Q.    Just that kind of an approximation?

9           A.    Yes.

10          Q.    Okay.  So if they would have a container  
11 of sludge, and then tires whole and shredded, and they  
12 would have the wood, then they would have their trash,  
13 do you recall if they had any other containers that  
14 would have had anything else in them that you could  
15 just sort of generally describe?

16          A.    No.

17          Q.    Okay.  Do you have any idea where their,  
18 you know, liquid waste would have gone to or anything  
19 like that?

20          A.    I have no idea.

21          Q.    Okay.  In the containers that you've  
22 described as having, you know, just the trash in them,  
23 is there anything that's of particular note, you know,  
24 any drums you ever did see in there or anything like  
25 that?

1 A. Not that I'm aware of.

2 Q. Pretty much the typical unexciting trash?

3 A. A trashman's life is dull.

4 Q. But getting more interesting as it's going  
5 on.

6 If I can just summarize, as far as Dayton  
7 Tire and Rubber, other than the sludge, you don't  
8 recall anything having a particularly interesting  
9 smell?

10 A. Well, the whole place smelled, but, you  
11 know, like rubber and rubber products and stuff.

12 Q. All right.

13 A. But as far as anything I was excited  
14 about, no.

15 Q. How about DAP, where are they located?

16 A. Over on Springfield Street.

17 Q. You indicated they were a pretty big  
18 customer.

19 A. Yes.

20 Q. Do you remember about how many containers  
21 we would have staged?

22 A. We had two, a forty-two compactor and a  
23 thirty-six open top.

24 Q. What was the trash -- how often would they  
25 be pulled out of up there?

1           A.    Well, sometimes maybe two or three times a  
2 week, sometimes less. It just depended on their  
3 production.

4           Q.    And do you know what they did produce?

5           A.    Caulkings, sealers. Their whole line -- I  
6 don't know what their whole line is, but it's tub and  
7 tile sealers and caulkings, such as that.

8           Q.    Okay. And what was the waste that they  
9 would have that you can recall?

10          A.    That's what it was was the caulking, glues  
11 and things, whatever wasn't up to specification. I  
12 don't know, I don't really know why it was throwed  
13 away.

14          Q.    Did they ever have any luggers or anything  
15 like that?

16          A.    Not that I'm aware of, no.

17          Q.    Any sludges or liquids?

18          A.    If they did, I wasn't aware of it, no.

19          Q.    Okay. How about Duriron?

20          A.    Duriron, we had a forty-two yard  
21 compactor, and that was general trash and metal  
22 scrap. That's all I know.

23          Q.    When you were hauling as a rolloff driver,  
24 what kind of paperwork did you have to do, did they  
25 make you fill out some kind of dump tickets?

1           A.    Yes, we filled out a ticket on each load  
2 that we hauled, plus we kept a time sheet that showed  
3 the times we went there and the times we left and got  
4 to landfills, such as that.

5           Q.    The time sheets were required by Danis  
6 then?

7           A.    I presume that's who it was by.

8           Q.    And then the tickets, would you do a  
9 different type of dump ticket, say, for Valleycrest as  
10 to, say, Tremont, Xenia?

11          A.    We made the same ticket, we just put the  
12 designation on the ticket as to which landfill we went  
13 to.

14          Q.    Would you indicate on the ticket also the  
15 size of the container?

16          A.    Yes.

17          Q.    Type of waste?

18          A.    No.

19          Q.    Okay. Can you recall anything else that  
20 would have been put on the ticket? You would put your  
21 name, of course, I assume?

22          A.    Yes, we always signed it, put the  
23 customer's name, the dump location, their address, the  
24 size of the container.

25          Q.    I don't suppose price information would

1 have been on there?

2 A. No. I still have no idea as to price.

3 Q. Okay. When you would -- your general  
4 routine was to be dispatched to a customer, picking up  
5 the load, taking it to the landfill. When you would  
6 take it to Valleycrest, can you recall anybody that  
7 worked over at Valleycrest who was an operations  
8 person or the manager or anybody like that?

9 A. No. I can't remember a soul that worked  
10 over there to be honest with you.

11 Q. Okay. Does anybody come to mind, you  
12 know, visually, just in terms -- I'm trying to think,  
13 was there someone that was like there all the time?

14 A. There was someone there all the time, but  
15 I just don't recall his name or if he was employed by  
16 IWD, by just Danis or whoever.

17 Q. What would have been the typical routine  
18 when you would arrive at the gate there at  
19 Valleycrest?

20 A. Well, we just drove in, and we got a dump  
21 ticket from the man at the office, went back, dumped  
22 the trash, left, went back to the customer.

23 Q. So, was there a gate there or something,  
24 or did you just pull up and go into the office?

25 A. No, there was a gate, but they opened it

1 at a certain time, and it stayed open, and the ticket  
2 man was right there at the gate, and as soon you came  
3 through, that's where you stopped.

4 Q. You would just pull up to the gate and do  
5 it that way?

6 A. Yes.

7 Q. You don't recall the name of anybody at  
8 the gate, do you?

9 A. No.

10 Q. When you would pull into Valleycrest, was  
11 there any specific routine, just other than the fact  
12 that they would -- I presume they would direct you to  
13 go to the area where they were dumping?

14 A. Well, there was always the dozers and  
15 stuff pushing the trash, and we always went to where  
16 they was at, because normally you would go where they  
17 was dumping the trash. But seeing as how it was owned  
18 by IWD or Danis, whatever you prefer, we generally  
19 went where we wanted to. We hauled twenty-four hours  
20 a day. And at nighttime there was nobody at the  
21 ticket office.

22 Q. During the time that you were hauling into  
23 Valleycrest, was there ever a time that you recall  
24 where it wasn't going twenty-four hours a day?

25 A. No.

1 Q. Would it be opened also on Saturdays?

2 A. Yes.

3 Q. Sundays?

4 A. I don't recall. I didn't work on Sundays  
5 back then.

6 Q. Okay. As far as the landfill itself is  
7 concerned, was there any area that was designated for  
8 a specific type of waste?

9 A. Not that I'm aware of, no.

10 Q. Did it take in all types of -- as far as  
11 you know, did it take in all different types of trucks  
12 and things like that? What I mean is rollofs,  
13 luggers, rear end, front end.

14 A. Yes.

15 Q. Okay.

16 A. Yes, everything was hauled there at one  
17 time.

18 Q. When you were there, do you know if it  
19 would also take in loads from trucks that would haul  
20 liquids, tank trucks?

21 A. I have no idea. If so, I never seen them.

22 Q. Okay. So at least when you were there,  
23 you don't recall tank trucks being brought in --

24 A. No.

25 Q. -- and discharging?



1 A. No, never seen a tank truck there.

2 Q. But luggers would come in?

3 A. Yes.

4 MR. LEININGER: Okay. Off the record  
5 for just a second.

6 (Pause in proceedings.)

7 Q. During our break I had shown to you some  
8 invoices from north sanitary landfill, I think giving  
9 the name of Valleycrest as the name at the address.  
10 You had indicated that you weren't familiar with these  
11 invoices?

12 A. No.

13 Q. You weren't familiar with the invoices?

14 A. Not with them. Never seen them before.

15 Q. What we have done is taken the invoices  
16 and identified from them the different names of the  
17 companies that were on there. What I'd like to do is  
18 go through those with you and see if that refreshes  
19 your memory as to whether you hauled for these  
20 customers.

21 Inland Manufacturing?

22 A. Yes.

23 Q. Inland Manufacturing Division, is that a  
24 division of General Motors?

25 A. Yes, sir.

1 Q. Where were they located?

2 A. In Vandalia, Inland was. We have an  
3 Inland in Vandalia and one here in Dayton. The  
4 specific addresses I couldn't give you.

5 Q. That's all right. Did you haul out of  
6 both of those --

7 A. Yes, very seldom.

8 Q. -- to Valleycrest?

9 A. That I can't tell you. I'm not sure if I  
10 hauled when we had Valleycrest or not.

11 Q. Do you know if Inland -- do you personally  
12 know whether Inland ever did haul into Valleycrest?

13 A. No, sir, I don't.

14 Q. Do you know what kind of waste that they  
15 had?

16 A. No.

17 Q. Do you know if they ever had luggers or  
18 anything like that?

19 A. Not that I'm aware of, no.

20 Q. Were they primarily a self-haul?

21 A. Yes.

22 Q. Were they a -- what you had indicated --  
23 do you know what landfills they did actually use?

24 A. No, I have no idea.

25 Q. Okay. Do you have any idea who would know

1 that information?

2 A. No.

3 Q. Okay.

4 A. I couldn't tell you that either.

5 Q. Frank Franklin Iron & Metal?

6 A. We hauled for them, yes. Not to  
7 Valleycrest, though.

8 Q. As far as you know?

9 A. No, I didn't anyhow. All I hauled was  
10 scrap metal from them.

11 Q. Where did you haul their waste?

12 A. We hauled stuff to Franklin Iron, never  
13 anything from them. We hauled scrap to them from  
14 General Motors and other places.

15 Q. Pennsylvania Iron & Coal?

16 A. We hauled -- we hauled some dust out of  
17 there, but I'm not sure where I hauled that to. I  
18 don't believe it was Valleycrest, though.

19 Q. Was it rolloff?

20 A. Yes.

21 Q. Williams Brothers Roofing on Valley  
22 Street?

23 A. Yes. That was roofing that we used to  
24 take to Valleycrest, yes.

25 Q. Was there any waste other than roofing

1 materials, roofing type waste?

2 A. No, just your basic roofing material.

3 Whatever went with it, I don't really know.

4 Q. Would that include things such as wood,  
5 asphalt shingles, things of that nature?

6 A. Yes.

7 Q. Home Builders & Modernizers, Webster  
8 Street?

9 A. That doesn't sound familiar.

10 Q. Schriber Sheet Metal & Roofers on Perry?

11 A. Well, I hauled from Schriber Roofers.

12 That must be their mailing address. That address  
13 would throw me. But we hauled from Schriber, yes.

14 Q. Okay. How often would you haul for  
15 Schriber?

16 A. That would vary. It depended on the size  
17 jobs they was working on, and how many containers they  
18 had. But we did substantial hauling for them at one  
19 time. They basically hauled their own stuff.

20 Q. What kind of waste was that, do you  
21 recall?

22 A. Basically roofing, that's what they were  
23 into, the trim around buildings. They were into the  
24 larger things like factories and such as that.

25 Q. You mentioned that we hauled for them, but

1 they also were self-haul?

2 A. Yes, they had semis that they usually  
3 hauled with.

4 Q. Were they a pretty big customer?

5 A. Fairly so, yes.

6 Q. Do you recall what landfill they did use?

7 A. The only ones I recall seeing them in was  
8 in Cardington.

9 Q. And that's the waste that -- that's the  
10 destination to where you would take their waste also?

11 A. That would have depended on what years it  
12 was that we was hauling for. But I really don't  
13 recall hauling back when we had Valleycrest, though.

14 Q. Okay. How about Abco Construction  
15 Corporation?

16 A. Yes, we hauled for them also. I don't  
17 recall what it was, I don't recall what it was, just  
18 construction material.

19 Q. Do you recall what landfill you hauled to  
20 from Abco?

21 A. No, sir.

22 Q. Children's Medical Center?

23 A. That went to the incinerator.

24 Q. And what incinerator is that?

25 A. That would have been the North Montgomery

1 County incinerator.

2 Q. Okay. City of Dayton?

3 A. Not that I'm aware of.

4 Q. Nu-Way Container Systems, Inc.?

5 A. Never heard of that, that I remember.

6 Q. Okay. Patterson Iron & Metal?

7 A. We hauled to them, not from them.

8 Q. C. Johnson? That's a general contractor.

9 Do you remember them as a customer?

10 A. No. They had a -- they had a landfill in  
11 West Carrollton that we hauled to occasionally,  
12 demolition debris.

13 Q. Frank Messer & Sons?

14 A. Yes, we hauled for them quite a lot. That  
15 would have been to Valleycrest and numerous other  
16 places, depending on the location.

17 Q. What type of waste would they have?

18 A. Construction.

19 Q. As far as you can recall, anything other  
20 than construction type waste?

21 A. No, sir.

22 Q. Southern Ohio Drywall Corp?

23 A. Don't recall hauling anything for them.

24 Q. J.H. Knake, K N A K E?

25 A. Never heard of it.

1 Q. Weimer, W E I M E R, Corp?

2 A. I've heard of them, but I don't recall  
3 ever hauling for them. I don't know what it would be  
4 either.

5 Q. NCR?

6 A. Oh, yes, we hauled a lot for NCR, but I  
7 don't recall anything going to Valleycrest.

8 Q. Did most of their waste go to Cardington  
9 or to --

10 A. I don't really know. I'm not sure where  
11 that stuff went to.

12 Q. Did you haul a lot for NCR?

13 A. Not -- not myself personally, no, but we  
14 did haul a substantial amount from NCR.

15 Q. Suburban Sanitary Service? No, that's a  
16 hauler.

17 C&N Industrial Maintenance?

18 A. Never heard of it.

19 Q. Village of Riverside?

20 A. We hauled to the Village of Riverside, but  
21 not for them.

22 Q. You would haul something sometimes -- IWD,  
23 Danis would haul stuff into --

24 A. Into Riverside, yes. Danis had a landfill  
25 in Riverside also.

1 Q. Do you recall the name of it, Riverside  
2 landfill?

3 A. That don't sound right. But we did have a  
4 landfill over there. I can't recall the name.

5 Q. Charles H. Shook?

6 A. Yes, we hauled a lot for Shook. That was  
7 construction material.

8 Q. Did that go into Valleycrest?

9 A. I'm sure that it did. We hauled for them  
10 quite some time. I couldn't give you specifically,  
11 but I'm sure some went to Valleycrest.

12 Q. Lawn-A-Mat?

13 A. I'm not familiar with that name.

14 Q. Mad River Township?

15 A. Not myself, no.

16 Q. Adrian Construction?

17 A. I don't believe I ever hauled for them.

18 Q. Okay. Kettering, City of Kettering?

19 A. No.

20 Q. Hughes-Bechtol?

21 A. Yes. That would have been to Valleycrest.

22 Q. What kind of waste would that have been?

23 A. They were in heating and construction, I  
24 believe, because we hauled a lot of heating duct and  
25 pipes and things like that from them.



1 Q. Any glues?  
2 A. No.  
3 Q. Anything like that?  
4 A. No.  
5 Q. Sludges, liquids?  
6 A. No. They weren't into that type of stuff.  
7 Q. Dusts, anything like that?  
8 A. No.  
9 Q. Loraine Construction?  
10 A. I'm not familiar with that name.  
11 Q. Okay. Getting back to Hughes-Bechtol, how  
12 big of a customer were they for Valleycrest?  
13 A. Hughes-Bechtol?  
14 Q. Yes.  
15 A. Well, I'm not really sure how large they  
16 was. We just hauled for them at numerous times. I  
17 couldn't really tell you what size customer they was.  
18 Q. Henry Stock & Son?  
19 A. Yes, we hauled for them occasionally, but  
20 I couldn't tell you where we hauled it to.  
21 Q. Okay. ARS Builders?  
22 A. That sounds familiar, but I can't really  
23 recall whether I did or did not.  
24 Q. Enterprise Roofing & Sheet Metal?  
25 A. Yes, we hauled for them. That went to

1 Valleycrest and to Cardington.

2 Q. What kind of waste was it?

3 A. Roofing materials.

4 Q. Korrext Plumbing Company?

5 A. I don't believe I ever hauled for those.

6 Q. Carey Paving?

7 A. Never hauled anything for Carey.

8 Q. Price Brothers?

9 A. Yes. Which Price Brothers now? They have  
10 numerous places. Used to haul for them out on 202 or  
11 235, one of them places. That went to Valleycrest.

12 Q. What kind of waste did they have?

13 A. Concrete products. They made sewer pipes  
14 and things like such as that.

15 Q. Concrete products being things like sewer  
16 pipes, is that what you're saying?

17 A. Yes.

18 Q. What would be like broken off spectrum?

19 A. Yes, ones that didn't meet specifications  
20 or didn't form right, they would throw the waste away.

21 Q. Do you recall them throwing away any of  
22 the materials that would make up the concrete, the  
23 dust or anything?

24 A. No, we didn't look into the containers, we  
25 didn't inspect it, we just hauled it.

1 Q. Leviton Construction?

2 A. Yes, we hauled for them, but I don't --  
3 yes, that went to Valleycrest also.

4 Q. Again, is that just basically your typical  
5 construction type?

6 A. Yes, yes, building, remodeling, such as  
7 that.

8 Q. Would they be things, I guess, such as  
9 asbestos or asphalt shingles or anything like that?

10 A. I'm not aware of either of those.

11 Q. Okay. Hillsmith & Company?

12 A. Doesn't sound familiar to me.

13 Q. Fiori Mill Supply?

14 A. Yes, we hauled to Fiori Mills, not from.  
15 That's a salvage place for cardboard, paper, a  
16 recycling center.

17 Q. Creative Construction?

18 A. Doesn't sound familiar.

19 Q. Ray Kline & Son?

20 A. Never hauled for Ray Kline.

21 Q. Muth Brothers?

22 A. Muth Brothers?

23 Q. Muth Brothers.

24 A. M U T H?

25 Q. Yes.

1           A.    I don't remember hauling anything from  
2 Muth Brothers.

3           Q.    Gunn, G U N N, Construction?

4           A.    I'm not familiar with that name.

5           Q.    Turner Construction?

6           A.    Yes, we hauled for them. I can't  
7 specifically say where I went to with it, but we did  
8 haul for them.

9           Q.    Anything other than typical construction  
10 waste?

11          A.    No, it was regular construction material.

12          Q.    Fryman & Kuck?

13          A.    Yes, we hauled for them. That was  
14 construction material also.

15          Q.    Lammers, L A M M E R S, Barrel Corp?

16          A.    Never heard of them.

17          Q.    Day-Met, Inc.?

18          A.    No, I never hauled for Day-Met.

19          Q.    H.J. Osterfeld?

20          A.    Yes, I hauled for them. That's  
21 construction.

22          Q.    Strunk Maintenance Company?

23          A.    Never heard of it.

24          Q.    M&M Construction Company?

25          A.    I've heard of it, but I'm not familiar

1 with ever hauling for them.

2 Q. Did you ever haul anything other than  
3 rollofs to Valleycrest?

4 A. Yes, I hauled lugger when I drove lugger,  
5 and I think I hauled some there with a front load, but  
6 I can't really recall.

7 Q. Okay. Who was the main lugger customer,  
8 if you can recall?

9 A. I have no idea. Our containers were just  
10 taken to the customer per their specifications. If it  
11 was a large job, large rolloff, small job, small  
12 luggers, depending on how much they had room to put a  
13 container in, such as that.

14 Q. Other than the companies that we have just  
15 discussed, do you remember anybody else that went into  
16 Valleycrest?

17 A. Not right offhand, no.

18 Q. You had indicated that after you did the  
19 rolloff you were a lugger driver --

20 A. Yes, sir.

21 Q. -- for about seven or eight years.

22 A. Yes, sir.

23 Q. When you were hauling luggers, what  
24 landfills do you recall using during that period of  
25 time?

1 A. In the near vicinity or --

2 Q. At all.

3 A. Well, I hauled to Valleycrest, Cardington,  
4 Indianapolis, Columbus, Michigan. That should cover  
5 it.

6 Q. When you would go to Indianapolis, do you  
7 recall what landfill that would have been?

8 A. ILWD, Industrial Liquid Waste Disposal.

9 Q. And Columbus?

10 A. It was to Systech.

11 Q. Okay. And in Michigan?

12 A. I can't remember the name of that place up  
13 there.

14 Q. Okay. Do you remember what community that  
15 was in?

16 A. No, it's been a long time back, I just  
17 can't remember them things.

18 Q. Do you remember what geographic area it  
19 was in Michigan?

20 A. No.

21 Q. When you hauled luggers into Valleycrest,  
22 was there a period of time after you were primarily a  
23 rolloff driver that you just hauled exclusively lugger  
24 loads?

25 A. Yes, I hauled lugger for about two years

1 consecutively, if I recall right, somewhere in that  
2 area.

3 Q. Did you haul primarily in the Dayton area?

4 A. Yes.

5 Q. And would the Dayton -- would all of the  
6 Dayton area lugger wastes go into Valleycrest?

7 A. Yes.

8 Q. And presumably you were dispatched out  
9 just like for the rollofs?

10 A. Yes.

11 Q. Do you recall the main customers that you  
12 were dispatched off to?

13 A. No.

14 Q. Do you recall any?

15 A. Not offhand, no.

16 Q. Okay. I have another list of customers  
17 that I'll go through, so perhaps that will help  
18 refresh your memory. But before I do that, I kind of  
19 want to go through some of your employment history and  
20 just get that squared away. You had indicated that  
21 you did rolloff from '72 for seven or eight years.

22 A. Right.

23 Q. And then did lugger for a period of time.  
24 Then you went back to rolloff.

25 A. Yes.

1           Q.    When you did the lugger loads, you  
2 indicate that was -- that all the Dayton lugger loads  
3 went into Valleycrest.

4           A.    Yes, your basic trash.

5           Q.    Okay. Was there any other type of lugger  
6 load that wasn't basic trash that you can recall?

7           A.    Yes, but that didn't go to Dayton.

8           Q.    Would that have gone to the incinerator?

9           A.    No, those were the ones we hauled out of  
10 state, those were classified hazardous waste, and they  
11 had designated places they had to go, that's why I  
12 mentioned Indianapolis, Michigan, Columbus.

13          Q.    Those would have to go out of state?

14          A.    Yes, those were designated by the  
15 customers where they would go. You know, specific  
16 kind of waste had to go to a specific place that was  
17 capable of handling it.

18          Q.    Did any customer ever designate  
19 Valleycrest for material?

20          A.    For that type of material?

21          Q.    For any type.

22          A.    I have no idea, we weren't told that.

23          Q.    Okay. Can you recall approximately when  
24 you were hauling the luggers?

25          A.    No, not really. I mean, I varied back and



1    forth on systems a little while, and I can't be sure  
2    of what years I actually hauled on that.

3            Q.    Okay, but then you had indicated you went  
4    back pretty much strictly to rolloff after the  
5    luggers?

6            A.    Yes.

7            Q.    Okay. When you were doing those rolloffs,  
8    what landfills would you use at that time?

9            A.    Well, again that depended on where we was  
10   at, and if we was designated to go to certain places.  
11   Basically Valleycrest, and such as hauling out of  
12   Mound Lab, then we went to Black Clawson in Franklin,  
13   because that's where it was designated to go to.

14           Q.    And then, you've been front load for, you  
15   say, the last six years?

16           A.    Approximately, yes.

17           Q.    Let me go through this list here. As you  
18   know, we have already got lots of information from you  
19   concerning Cardington, so there's no sense in going  
20   through all that again. I'd like to go through a lot  
21   of the similar customers to see whether or not you've  
22   hauled for them. And if it's been to Cardington, as I  
23   said, we won't rehash that, today anyway. As far as  
24   municipalities are concerned, you had indicated -- let  
25   me just go through these once more. Dayton?

1 A. No.

2 Q. Kettering?

3 A. No.

4 Q. Moraine?

5 A. No.

6 Q. Miamisburg?

7 A. No.

8 Q. Oakwood?

9 A. No.

10 Q. Tipp City?

11 A. No.

12 Q. West Carrollton?

13 A. No.

14 Q. West Milton?

15 A. No.

16 Q. Farmersville?

17 A. No.

18 Q. We discussed briefly Inland. As far as  
19 GM, Delco, did you ever haul for them other than what  
20 you described for Inland?

21 A. Yes. I hauled from Delco Products on  
22 Woodman Drive. That went to Cardington.

23 Q. Other than what went to Cardington,  
24 anything else for GM, Delco, Inland?

25 A. I hauled some from Inland, but that was on

1 a rolloff.

2 Q. And that's what we just described earlier?

3 A. Yes.

4 Q. How about Frigidaire?

5 A. On rolloff I hauled from Frigidaire to  
6 Cardington.

7 Q. Monarch Marking?

8 A. Yes.

9 Q. Other than Cardington?

10 A. If it would have been other than  
11 Cardington, it would have been to the south  
12 incinerator.

13 Q. Okay. Presto Adhesives?

14 A. Yes, Cardington.

15 Q. Karolton Envelope or Paper?

16 A. That would have went to Cardington.

17 Q. But not to any other landfill?

18 A. Not that I'm aware of.

19 Q. Okay. Bergstrom Paper?

20 A. That went to Cardington.

21 Q. But no other landfill, right?

22 A. Not that I'm aware of.

23 Q. As we go through these, just say what  
24 landfill it went to, and if it went to anything other  
25 than Cardington, I would just ask you about that.

1 Monarch Molders?

2 A. Cardington.

3 Q. Wright-Patt, Wright-Patterson Air Force  
4 Base?

5 A. Cardington and Valleycrest. Not  
6 specifically for Wright-Patt. The only thing we  
7 hauled for Wright-Patterson specifically was a  
8 compactor of trash, and I don't even recall where that  
9 went to.

10 Q. Builders Insulation?

11 A. That went to Cardington.

12 Q. NCR?

13 A. I don't recall.

14 Q. DP&L?

15 A. Cardington.

16 Q. Specialty Paper?

17 A. Cardington.

18 Q. Enterprise Roofing?

19 A. Cardington.

20 Q. Mendenhall Carpeting?

21 A. Cardington.

22 Q. Moraine Materials?

23 A. Cardington.

24 Q. BF Goodrich?

25 A. Never hauled for them.

1 Q. St. Regis Paper?  
2 A. That went to Troy.  
3 Q. To the Troy --  
4 A. That's in Troy.  
5 Q. Oh, is it?  
6 A. Yes, that and BF Goodrich.  
7 Q. Okay. Did you haul for St. Regis Paper?  
8 A. In Troy, but that went to Troy.  
9 Q. To the Troy transfer?  
10 A. Yes.  
11 Q. Just paper products basically?  
12 A. As far as I recall, yes.  
13 Q. Okay. BF Goodrich, did you say you hauled  
14 for them also?  
15 A. A couple times I hauled for them. That  
16 went to the Troy transfer station also.  
17 Q. Do you know what kind of waste they had?  
18 A. Never even looked to see what it was.  
19 Q. Okay. Dayton Drum?  
20 A. No, I don't believe so.  
21 Q. GH&R Foundry?  
22 A. That went to Cardington and Valleycrest.  
23 Q. Was that primarily foundry sand?  
24 A. Yes, that and skids and metal by-products.  
25 Q. Any liquids, sludges?

1 A. Not that I recall.

2 Q. Bimac?

3 A. I'm not sure if I hauled for them or not.  
4 I can't be for certain on that.

5 Q. Okay. Hewitt Soap?

6 A. Yes, that went to Cardington.

7 Q. Megacity --

8 A. And Valleycrest.

9 Q. Oh, okay. Do you know what kind of waste  
10 they had?

11 A. Soap.

12 Q. Off spec soap, stuff like that?

13 A. Yes, that and the wrappings, you know, if  
14 it wasn't up to specification.

15 Q. Megacity Warehouse?

16 A. Yes, I did haul for them, but I don't  
17 recall where it went to.

18 Q. Okay. Do you remember what kind of waste  
19 that was?

20 A. No.

21 Q. Miami Paper?

22 A. Yes, we hauled for them. It went to  
23 Cardington, if I remember correctly.

24 Q. Okay. Ohio Bell?

25 A. Yes, that went to Cardington.

1 Q. Philips Industries?

2 A. Cardington and Valleycrest.

3 Q. Do you remember what -- what their stuff  
4 was?

5 A. No, just trash.

6 Q. Okay. Sherwin-Williams?

7 A. Yes, we hauled for them. That went --  
8 that went to the north incinerator.

9 Q. If the incinerator was down, do you know  
10 where they would divert you to?

11 A. No. If I'm not mistaken, I believe that  
12 had to go to the incinerator due to what it was. I'm  
13 not sure what all was in it, but it was specified that  
14 it had to go to the incinerator.

15 Q. Standard Register?

16 A. That went to the south incinerator.

17 Q. Would that be diverted to --

18 A. I couldn't say, I'm not sure.

19 Q. Inmont Paper?

20 A. Don't recall that.

21 Q. Tricil Environmental?

22 A. Yes, I hauled for them a couple of times.  
23 I went to Cardington.

24 Q. Nowhere else, as far as you can recall?

25 A. Not that I remember, no.

1 Q. Premiere Corporation?

2 A. That went to -- I don't recall us having  
3 that one. Cardington was there. I don't know where I  
4 hauled that one to.

5 Q. Color Pac?

6 A. That went to Franklin and I believe  
7 Cardington at times. I'm not sure.

8 Q. Okay. Cargill?

9 A. Well, we figured out that I hauled that to  
10 Cardington. I couldn't really remember it, but  
11 evidently I did. My time sheet said I did, so I did,  
12 but --

13 Q. You don't recall?

14 A. No.

15 Q. Okay. Automotive Warehouse?

16 A. I've hauled it, but I don't recall where I  
17 hauled it to.

18 Q. King Iron or Aluminum?

19 A. Yes, I hauled that, but I -- that went to  
20 Valleycrest, and possibly Cardington.

21 Q. Can you describe what that waste was, do  
22 you have any idea?

23 A. It was aluminum by-products basically.

24 Q. Scraps and things like that?

25 A. Yes. I don't know what all they made, but



1 storm windows, doors, such as that.

2 Q. Base Materials?

3 A. Yes, I hauled for them, but I don't recall  
4 where to.

5 Q. US Corrugated?

6 A. That went to Valleycrest and Cardington,  
7 if I recall.

8 Q. Anything other than paper products?

9 A. Not that I remember, no.

10 Q. Is that what it was, paper products?

11 A. I believe so, yes.

12 Q. Gateway Erectors?

13 A. I don't think I hauled for them.

14 Q. Ryan Homes?

15 A. Yes, that was construction material. That  
16 would have went to Cardington and Valleycrest.

17 Q. General Films?

18 A. That was in Sidney, that would have went  
19 to Sidney landfill.

20 Q. Stolle?

21 A. That would have also went to Sidney  
22 landfill.

23 Q. Hughes-Bechtol?

24 A. That went to Cardington and to  
25 Valleycrest.

1 Q. I think there may have been -- did I  
2 already ask you about Hughes-Bechtol?

3 A. Yes, once before.

4 Q. I thought they were on the other list.  
5 Okay.

6 California Market?

7 A. Yes, we hauled for them, but I don't  
8 remember where it went to.

9 Q. Defense Electronics Supply Center?

10 A. I don't think we specifically hauled for  
11 them.

12 Q. You mean they may have been a self-haul or  
13 something?

14 A. We might have had construction people out  
15 there, but hauling strictly for them, we might have  
16 had someone that did, but I wasn't involved in it.

17 Q. Elder-Beerman?

18 A. Yes, that would have went to Cardington.

19 Q. Earl Scheib?

20 A. Used to -- not on a rolloff or lugger, we  
21 used to pick them up with a front load, trash from  
22 painting and such.

23 Q. Amole Company?

24 A. I'm familiar with the name, but I don't  
25 think I hauled for them.

1 Q. You mentioned Earl Scheib you may have  
2 done some front load.

3 A. Yes, we had a customer down on Far Hills  
4 Avenue.

5 Q. Would that have all gone to Cardington  
6 or --

7 A. Most of the front loads then went to  
8 either the incinerator or Cardington, but I wouldn't  
9 know which that would have went to.

10 Q. Did you ever haul anything other than  
11 loaders, luggers and rollofs into Valleycrest that  
12 you can recall?

13 A. Front load.

14 Q. You did do front load in there?

15 A. Yes.

16 Q. Do you remember any of the specific front  
17 load customers?

18 A. No, that's been a long time back and too  
19 many of them a day to remember which ones went there  
20 and which ones didn't.

21 Q. Do you remember what routes you had with a  
22 front end?

23 A. Back then it was Route 31, it was  
24 Kettering, Centerville, parts of Oakwood.

25 Q. Okay. Front end was the only time when

1 you would have a specific geographic area that you  
2 worked out of, right?

3 A. Yes.

4 Q. Do you remember any other routes that you  
5 had for front end, other than what you've got right  
6 now?

7 A. Myself?

8 Q. Yes.

9 A. No, that's the only ones I ran, the ones I  
10 had in Kettering and Centerville and the one I have  
11 now.

12 Q. Systems Research Lab?

13 A. I've heard of it, but I've not had no  
14 dealings with it.

15 Q. Leland Electrosystems?

16 A. No, not myself.

17 Q. Do you know if they went into Valleycrest?

18 A. I wouldn't have any idea.

19 Q. Okay. Mazer Corp, Mazer Corporation?

20 A. Yes, that went to the north incinerator.

21 Q. And you don't know where it would have  
22 been diverted if the incinerator was down?

23 A. No, it would have depended on what  
24 landfills was opened back then when I hauled, but  
25 that's the only place I ever remember hauling it to

1 was the incinerator.

2 Q. Okay. When the incinerator was down, do  
3 you know if things were ever diverted to Valleycrest  
4 just generally?

5 A. I'm really not sure. I don't think there  
6 was a lot diverted to Valleycrest back then, not from  
7 the incinerator that I recall.

8 Q. How about to Powell?

9 A. No.

10 Q. Pantorium Cleaners?

11 A. I never hauled for them.

12 Q. University of Dayton?

13 A. Yes, I hauled for the University of  
14 Dayton. That would have went to Cardington or the  
15 south incinerator, if I remember right.

16 Q. Riggs Sheet Metal?

17 A. I don't recall hauling for them.

18 Q. Gem City Engineering?

19 A. Yes, I hauled for them, but I don't  
20 remember where to.

21 Q. Mullins Rubber?

22 A. That would have went to Cardington or  
23 Valleycrest. I'm not sure we had them when  
24 Valleycrest was opened or not.

25 Q. What kind of waste would they have?

1           A.    Rubber products.  I don't know what  
2 specific rubber, but they dealt with rubber.

3           Q.    You don't recall any specific things such  
4 as sludges or liquids?

5           A.    No, nothing like that.

6           Q.    No drums or anything like that?

7           A.    No.

8           Q.    American Modular?

9           A.    Yes, we hauled for them.  That was  
10 construction.

11          Q.    LB Robinson?

12          A.    Yes, we hauled for them.

13          Q.    American Modular you hauled to where?

14          A.    I can't be specific.  I don't recall.  All  
15 I know, I did haul for them.

16          Q.    Same with LB Robinson?

17          A.    Yes.

18          Q.    Dayton Sure-Grip?

19          A.    That went to Cardington.

20          Q.    Tait Manufacturing?

21          A.    I don't recall where I hauled it to, but  
22 yes, I have hauled for them.

23          Q.    Dyna Corporation?

24          A.    I don't recall hauling them.

25          Q.    Roberts Consolidated?

1           A.    That went to Valleycrest or Cardington,  
2 whichever one was still opened. I don't know.

3           Q.    Do you know what kind of waste Roberts  
4 Consolidated had?

5           A.    No.

6           Q.    Do you know about how often they would be  
7 picked up?

8           A.    Maybe once a week. Possibly more, but I  
9 don't believe so.

10          Q.    Bendix?

11          A.    Yes, we hauled for them, but that would  
12 have went to Valleycrest, and then later to  
13 Cardington.

14          Q.    Were they pretty sizeable?

15          A.    Yes, that was a fairly large customer.  
16 Some of it even went to the north incinerator. I  
17 don't recall why, but it did.

18          Q.    Can you recall about how many containers  
19 that would be stationed over there at Bendix?

20          A.    There was basically three over there, if I  
21 recall right.

22          Q.    Do you know about how often they would be  
23 picked up?

24          A.    No, I can't really recall. It just  
25 depended on their production.

1 Q. Would it be at least once a week?

2 A. Yes, I would say so.

3 Q. Okay. Type of waste at Bendix?

4 A. I have no idea.

5 Q. Lewis Painting?

6 A. No, I don't recall ever hauling for Lewis

7 Painting.

8 Q. St. Elizabeth's Hospital?

9 A. Yes, that went to the south incinerator.

10 Q. Rinks Company?

11 A. That either went to the incinerator or to

12 Cardington.

13 Q. Atlas Die Casting?

14 A. I'm sure I hauled that, but I don't know

15 where to.

16 Q. Do you know what kind of waste they had?

17 A. No. I can just barely remember hauling

18 it, so I couldn't tell you what it was.

19 Q. K Mart?

20 A. Yes, that went to Valleycrest and to

21 Cardington.

22 Q. Do you remember anything specific about

23 their waste?

24 A. No, it was general department store trash.

25 Q. Would that have been rolloff, lugger?



1           A.     That was a rolloff. We have had front  
2 load containers at them also.

3           Q.     Blue Bird Pie?

4           A.     Yes, that went to the incinerator.

5           Q.     Borden?

6           A.     Dairy?

7           Q.     Yes.

8           A.     That went to the incinerator basically.  
9 It could have ended up in Cardington, but I'm not  
10 sure.

11          Q.     Charles Shook?

12          A.     That's the second time around on that.

13          Q.     Sorry about that. Gayston Corp?

14          A.     I don't recall if we had that one when  
15 Valleycrest was still opened or not. It probably went  
16 to Cardington, possibly to Valleycrest, but I'm not  
17 sure.

18          Q.     Any idea what Gayston Corp does?

19          A.     No idea.

20          Q.     Penney's, JC Penney's?

21          A.     Yes, that's a department store. That went  
22 to the incinerator.

23          Q.     Okay. Tru-Foto, Inc.?

24          A.     I think we hauled that to Valleycrest and  
25 to Cardington, but I can't be specific on that.

1 Q. Any idea of what kind of waste they had?

2 A. Films.

3 Q. Is that just a guess?

4 A. No, that's what it was. It was a  
5 container filled with films, you know, that either  
6 didn't come out right or whatever, but that's all it  
7 was.

8 Q. Okay. Do you know how many containers  
9 they had out there?

10 A. One.

11 Q. Do you remember about how often they would  
12 be picked up?

13 A. No, I can't recall that at all.

14 Q. Is there a general range of, for example,  
15 if a customer has -- take Tru-Foto or just any  
16 specific customer, other than the real industrial ones  
17 that are just turning these around all the time, is  
18 there pretty close to a minimum amount of time before  
19 they would be filled up, do you know what I mean?

20 A. No, it would vary, just depending on how  
21 much business they did.

22 Q. Okay. Ohio Precision Castings?

23 A. Yes, I hauled that. It went to  
24 Valleycrest, Valleycrest and Cardington.

25 Q. Do you recall how many containers they

1 had?

2 A. Three.

3 Q. Is the number of containers often a help  
4 to determine how big of a customer they were, or does  
5 it necessarily follow?

6 A. I don't know. It would depend on the  
7 different types of trash and where they hauled their  
8 trash from, you know. It wouldn't make sense for  
9 somebody to haul trash from one end of a building  
10 clear to another end if it was a lengthy building, so  
11 they would put one near one end and one near another  
12 end, which would save time.

13 Q. So if you had three containers that  
14 doesn't mean they're --

15 A. Doing a fantastic business, no.

16 Q. It could just mean they would --

17 A. Be more convenient to get to and save time  
18 and money.

19 Q. Do you recall how often they would be  
20 picked up?

21 A. No, sir, I don't.

22 Q. Type of waste at all?

23 A. They made moldings for something. I don't  
24 know what.

25 Q. Do you know what kind of waste it would be

1 then?

2 A. No, it looked like plaster, but I'm sure  
3 it wasn't. I don't know what it was, but it looked  
4 like plaster.

5 Q. Dayton Walther?

6 A. Yes, we hauled for Dayton Walther. That  
7 would have went to Cardington.

8 Q. Economy Rubber Products?

9 A. That name doesn't sound familiar.

10 Q. Cooper Jarett?

11 A. I hauled for them once, I think. And that  
12 was a trucking company. I don't know what they had in  
13 their stuff, what was left in trailers or trash.

14 Q. You mean just one dispatch?

15 A. I was. It stayed there, but I only hauled  
16 that one time.

17 Q. Do you know where they were hauled into?

18 A. No.

19 Q. Vindale Corp?

20 A. That would have went to Valleycrest and to  
21 Cardington.

22 Q. Do you know if they were a small, medium,  
23 large company?

24 A. I would say medium. They made house  
25 trailers.

1 Q. Do you remember what kind of waste they  
2 would have had?

3 A. Wood, aluminum, carpet, such as that,  
4 whatever was left when they was building trailers.

5 Q. Opti-Gauge?

6 A. Opti-Gauge? Yes, that went to Cardington  
7 and Valleycrest.

8 Q. Again, do you know if they were small,  
9 medium, large?

10 A. It was a fairly good sized company, I  
11 believe. They made circuit boards.

12 Q. Their waste, therefore, then would have  
13 been what kind, do you know?

14 A. It was whatever circuit boards are made  
15 out of, plastic and metal trim or whatever, I don't  
16 know what all it was..

17 Q. Do you recall about how often a load would  
18 come out of there?

19 A. No, maybe once a week or once every two  
20 weeks.

21 Q. Weitz Company, W E I T Z?

22 A. I don't recall the name.

23 Q. Valentine Matchplate?

24 A. Yes, we hauled for them. That would have  
25 went to Valleycrest.

1 Q. Small, medium, large?

2 A. That was a small company.

3 Q. So, a small company like that would have  
4 had a pull about how often?

5 A. It wasn't very often. It may have had a  
6 small container.

7 Q. When you say a small container --

8 A. They had a lugger container in there.

9 Q. What's that, a ten yard?

10 A. I think they had a sixteen yard, if I'm  
11 not mistaken.

12 Q. Why would one company have a lugger as  
13 compared to rolloff, is it because luggers are  
14 smaller?

15 A. Convenience. If you had a place the size  
16 of this room, a lugger would fit just right for the  
17 room, because some people had them inside their  
18 buildings.

19 Q. So having a lugger doesn't necessarily  
20 mean that the waste was one thing or another?

21 A. A size.

22 Q. Just a size?

23 A. Convenience of the customer, convenience  
24 of their personnel.

25 Q. Meir Brass, M E I R?

1 A. Not familiar with them.

2 Q. Ohio Sealer?

3 A. Yes, I hauled for them to Cardington.

4 Q. Trotwood Corporation?

5 A. That would have went to Valleycrest and  
6 Cardington, if we still had them when Cardington was  
7 open.

8 Q. Medium, small, large?

9 A. Fairly good sized. They made house  
10 trailers also.

11 Q. Do you remember how many containers they  
12 had?

13 A. We had one.

14 Q. Do you remember how often they would be  
15 pulled out of there?

16 A. No, about once every other week, if I  
17 remember right, possibly once a week.

18 Q. Do you remember about what size of  
19 container they would have had?

20 A. It was a thirty-six or a forty yard.

21 Q. Okay. UPS?

22 A. I hauled for them, but I don't recall  
23 where to.

24 Q. Okay. We just have a few more. Dayton  
25 Door Sales?

1           A.    Yes, those went to Valleycrest.  I don't  
2 believe I ever hauled any to Cardington, but I might  
3 have.

4           Q.    What I'm looking at right now is for  
5 Powell.  We had some documents --

6           A.    We might have even hauled Dayton Door to  
7 Powell.

8           Q.    We have dump tickets, and we hired someone  
9 to go through and pull off all this information on all  
10 these dump tickets, and what they did was, they were  
11 able to identify on some of these dump tickets into  
12 Powell, among other things, drivers' names.

13          A.    I'm sure you've got my name in there.

14          Q.    And so we've got your name.  And so I'm  
15 going to give this to you.

16          A.    Gee, thanks.

17          Q.    And if you can just take a look at that,  
18 take a couple of minutes if you want, and see if you  
19 can, you know, just go through those if you would and  
20 say if you recall hauling for them and the -- how  
21 often, and what type of waste, if you do recall.

22          A.    Danis could have been anything.

23          Q.    Sure.

24          A.    Bendix Corporation.  I really don't know  
25 about them, what they had.



1 Q. Do you know about how often?

2 A. Bendix once a week possibly. Maybe more  
3 often.

4 Q. Would that have been -- as I indicated,  
5 that's a list of dump tickets into Powell.

6 A. This sheet is just strictly for Powell.

7 Q. Yes, just strictly for Powell Road. What  
8 would have caused you to -- you know, we talked  
9 earlier about IWD being owned by Danis wanting to use  
10 their own landfill. Do you recall when you started  
11 going into Powell Road, or why?

12 A. We would have only went there if we was  
13 designated to go there by the dispatcher. For what  
14 reason, I couldn't tell you. But looking at those  
15 dates, '83, Valleycrest should have been shut down by  
16 then.

17 Q. Right.

18 A. So it would have been strictly for  
19 convenience, being close to it.

20 Q. Okay. So those customers, perhaps you can  
21 go through this, but you had mentioned Bendix maybe  
22 once a week. Type of waste?

23 A. I don't recall.

24 Q. Okay.

25 A. Berger Iron, that was just your basic

1 trash. Those were ten yard luggers. It wasn't a very  
2 often haul. Bowser-Morner, I don't know why it was  
3 hauled over there, but evidently it was.

4 Q. Do you remember what kind of waste?

5 A. That was a ten yard lugger. They're in  
6 concrete pouring, they test concrete for strength and  
7 bridges and stuff like that, and so, it was samples of  
8 concrete for that kind of stuff. Concourse  
9 construction. I don't recall hauling that, but it  
10 only shows one time, so I couldn't tell you what that  
11 was.

12 Q. Okay.

13 A. Cargill. That would have been corn starch  
14 and things such as that.

15 Q. Do you remember if they were pretty big?

16 A. Oh, absolutely. Here it shows five loads  
17 just on this one occurrence. As I recall that's part  
18 of Danis Industry.

19 Dayton Door Sales. That was doors and  
20 windows and stuff like that. A lot of overhead  
21 doors.

22 Duriron would have been metal dust and  
23 wood and stuff like that. They made wheels and things  
24 for trucks.

25 Q. Metal dust?

1           A.     Yeah, such as that, yes.

2                     Ed's Truck & Trailer. That was just basic  
3 trash. They worked on trucks and trailers.

4                     Fenton Foundry. That was trash and some  
5 metal dust.

6                     Gem City Tool. I have no idea what was in  
7 that.

8                     IF Webber. That's construction. I have  
9 no idea.

10                    JE Duncan. Construction.

11                    LB Schroeder. Construction material.

12                    Pizza Hut. That was construction when  
13 they was rebuilding new places.

14                    Ply Bricko. I can't recall what material  
15 that was.

16                    They have here St. Elizabeth Hospital, but  
17 I fail to understand why. I can't tell you whether  
18 that was construction or what.

19                    Tom Heilman. I have no idea of that name  
20 whatsoever.

21                    Van Grove Construction. I can't recall  
22 the name, so I can't tell you what it was.

23                    Viacom. That would be cable and some  
24 wires for televisions and such.

25                    Winston Heat Treat. I can't remember the

1 material that come out of there.

2 Yale Industries. That's basic trash,  
3 aluminum, stuff like that, because they make doors and  
4 windows.

5 Q. Do you remember who else hauled into  
6 Valleycrest, other than -- any other haulers into  
7 Valleycrest?

8 A. I wouldn't even begin to try to tell you  
9 anybody else that hauled in there, I don't know. I  
10 never paid no attention to it, who hauled in there.

11 MR. LEININGER: Off the record.

12 (Pause in proceedings.)

13 MR. LEININGER: I think that's all. I  
14 have no further questions for you.

15 (Thereupon, the deposition concluded at  
16 6:16 o'clock a.m.)

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1 STATE OF OHIO )


2 COUNTY OF MONTGOMERY ) SS: CERTIFICATE

3 I, Carol A. Sawyer, a Notary Public within and  
4 for the State of Ohio, duly commissioned and  
5 qualified,

6 DO HEREBY CERTIFY that the above-named  
7 VERNON VENCILL, was by me first duly sworn to testify  
8 the truth, the whole truth and nothing but the truth;  
9 that said testimony was reduced to writing by me  
10 stenographically in the presence of the witness and  
11 thereafter reduced to typewriting.

12 I FURTHER CERTIFY that I am not a relative or  
13 Attorney of either party nor in any manner interested  
14 in the event of this action.

15 IN WITNESS WHEREOF, I have hereunto set my hand  
16 and seal of office at Dayton, Ohio, on this  
17 16th day of March, 1993.

18  
19   
20 CAROL A. SAWYER  
21 NOTARY PUBLIC, STATE OF OHIO  
22 My commission expires 10-27-97  
23  
24  
25